

# Statement in Response to the Inspector's Matters and Issues for Examination.

## Matter 11 Infrastructure

### Eversley Storage ®

October 2018



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CHARTERED TOWN PLANNERS

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## INTRODUCTION

- 1.1 On behalf of our client, Greenfords Ltd <sup>®</sup>, trading as Eversley Storage <sup>®</sup>, we set out additional representations in response to the Inspector's Matter 11 which sets out a list of issues to be considered further for the Examination into the Hart District Local Plan with regard to Infrastructure. We are only replying to those questions which are of relevance to our client's site and have, as requested, kept our responses concise and relevant.
- 1.2 Our client owns the Eversley Storage <sup>®</sup> site on Brickhouse Hill, Fleet Road, Eversley, RG27 0PY, which is a long established and successful storage business, employing local people. As well as the existing site, our client also owns additional land (which wraps around the existing site), which is included within the area proposed for allocation under Policy ED2: Employment-land.
- 1.3 We note that as the Local Plan is being prepared under the transitional arrangements, it has to show conformity with national policy as set out within the National Planning Policy Framework of 2012, rather than the updated NPPF of 2018. We therefore refer to the paragraph numbers of the 2012 NPPF and if appropriate cross reference to the 2018 NPPF.
- 1.4 We confirm that we currently wish to attend the Examination hearing session on Matter 11.



## RESPONSE TO MATTER 11

### INSPECTOR'S QUESTIONS: INFRASTRUCTURE

- 1.5 **Question 11.20** Is policy I6 justified and consistent with national policy? Is there a need to refer to viability?

### RESPONSE TO INSPECTOR'S QUESTIONS

- 1.6 To set the scene for the Inspector, our client is highly supportive of the principle of this policy, which relates to a modern-day planning issue, relevant to our client's business. The current broadband supply to our client's site at Eversley Storage is poor, but just slightly better than the maximum speed for the government support schemes. The proposed expansion of our client's business and many other small businesses in the locality would certainly be assisted by an improved Broadband supply; a fibre rather than a copper supply.
- 1.7 Including a policy on this issue is both justified and also in conformity with national policy as set out both in the Council's own evidence base and in the NPPF (2012). The 2012 NPPF, at paragraph 42 states that "Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services". Paragraph 43 then goes on to confirm that through Local Plans "...local planning authorities should support the expansion of electronic communications networks, including telecommunications and high-speed broadband".
- 1.8 The 2018 NPPF is also useful as it goes slightly further than the earlier NPPF, seeking to commit local planning authorities to clarifying how the infrastructure will actually be delivered, which is an important change. Paragraph 112 of the 2018 NPPF sets out the role that 'high quality and reliable communications infrastructure' plays in economic growth and social well-being. The paragraph goes on to state that "Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new development....".



- 1.9 Our concern with the wording of Policy I6 was set out in our response to the Regulation 19 consultation to the Hart Local Plan. Our main concern is the lack of clarity in the policy about how the necessary infrastructure will be delivered, and who will pay for it. This is the crux of our concern. The policy suggests at the start that the Council will work with the telecommunications industry in maximising improvements to coverage. This is appropriate and accords with Government policy in the 2018 NPPF in this regard. However, as the policy moves on, the onus seems to fall on the developer, regardless of their size and the scale of the proposed development, in terms of a requirement to install high speed broadband infrastructure.
- 1.10 We understand from the Infrastructure Delivery Plan that Hampshire County Council is making a considerable investment to increase broadband coverage across Hampshire. There is also an ongoing commercially funded rollout of superfast broadband. There is no evidence in the background papers that there is any requirement for developers to pay towards this in order for it to be delivered.
- 1.11 Whilst strongly supportive of the principle of the proposed policy, we are keen to ensure that the policy does not create any unnecessary costs to the developer which are not reasonably related to the development proposal. We therefore agree that the policy should refer to the issue of viability, to ensure that this matter is taken into account. This would be an effective and justified approach in terms of the tests of soundness.
- 1.12 Furthermore, for developers to be required to future proof new development, crucially there must be a reasonable degree of certainty that the telecommunications industry will in the near future expand services within the area. Additionally, as is the case for our client, it must also be accepted that some businesses will have already made alternative provisions in order to gain internet access and that these alternative provisions will have already had cost implications for those businesses. A reasonable approach must therefore be undertaken to ensure that small scale businesses are not unreasonably impacted by the proposed policy. We however strongly agree that intervention by Councils into the investment plans of telecommunications companies should be carried out, with a view to seeing that improvements are made within the District.